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ATTORNEY FOR DEBTOR

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

**IN RE:**

**Wael Samir Falts**

**Debtor**

**CASE NO. 24-43547-  
MXM-13**

**CHAPTER 13**

**NOTICE OF ADDITIONAL FEES AND RULE 2016 DISCLOSURES**

NO HEARING WILL BE CONDUCTED ON THIS NOTICE UNLESS A WRITTEN RESPONSE IS FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT AT 501 WEST TENTH STREET, FORT WORTH, TEXAS 76102 BEFORE THE CLOSE OF BUSINESS ON October 22, 2024, WHICH IS AT LEAST FOURTEEN (14) DAYS FROM THE DATE OF SERVICE HEREOF.

ANY RESPONSE SHALL BE IN WRITING AND FILED WITH THE CLERK, AND A COPY SHALL BE SERVED UPON COUNSEL FOR THE ATTORNEY OR LAW FIRM SUBMITTING THIS NOTICE, THE DEBTOR, AND THE CHAPTER 13 TRUSTEE PRIOR TO THE DATE AND TIME SET FORTH HEREIN. IF A RESPONSE IS FILED A HEARING MAY BE HELD WITH NOTICE ONLY TO THE OBJECTING PARTY AND THE CHAPTER 13 TRUSTEE.

IF NO HEARING ON THIS NOTICE IS TIMELY REQUESTED, THE FEES AND COSTS

REQUESTED HEREIN SHALL BE DEEMED ALLOWED AND MAY BE DISBURSED BY THE CHAPTER 13 TRUSTEE OR PAID DIRECTLY TO THE ATTORNEY OR LAW FIRM FILING THIS NOTICE AS SET OUT HEREIN.

Pursuant to Paragraph 21 of the Standing Order Concerning all Chapter 13 Cases for the Northern District of Texas ("Standing Order"), the undersigned gives notice of the following requested Additional Fees and related costs, if applicable.

1. The source of the compensation is: ☒ Debtor(s) or ☐ OTHER (specify source):

NA.

2. ☒ I have not agreed to share the Additional Fees set out herein with any other person unless they are a member or shareholder of or an associate employed by my law firm.

☐ I have agreed to share the Additional Fees with another person or persons who are not a member or shareholder of or an associate employed by my law firm. A copy of the agreement, together with a list of the names of the people sharing in the compensation and the amount each is to receive, is attached.

3. The total amount of any fees and costs that I or my law firm have become entitled to receive, prior to this Notice of Additional Fees, but not including the Additional Fees and costs requested herein: \$4,250.00 (Include all fees even if not yet paid and include the Standard Fee or Business Standard Fee.)

4. The Additional Fees and costs requested herein [PICK ONE]:

☐ have already been paid to me ☐ will be paid to me directly

☒ will be paid by the Chapter 13 Trustee.

5. Debtor(s) has/have agreed to the Additional Fees and costs requested herein.

6. In accordance with the provisions of the Standing Order, I request Additional Fees in the amount of \$200 for (indicate requested fees):

☐ Post-confirmation motion to reinstate case ☒ Fee included in Plan Base

☒ Motion to Extend/Impose the Automatic Stay Amount pre-confirmation

☐ Chapter 13 Debtor's Request to Incur Debt (to purchase a vehicle)

7. In accordance with the provisions of the Standing Order, I request Additional Fee in the amount of \$450 for (indicate requested fees):

☒ Case in which Debtor will receive 3002.1 notices ☒ Fee included in Plan Base Amount pre-confirmation

☐ Representation on a post-confirmation Plan Modification filed by the Trustee or an unsecured creditor.

☐ Motion to Sell Real Property ☐ Motion to Incur Debt (other than Debtor's Request to purchase a vehicle)

☐ Motion to modify/refinance mortgage (other than through The LMM Program) ☐ Motion to Approve Compromise and Settlement Agreement

☐ Motion for Relief from the Automatic Stay pursuant to paragraph 21(g)(8)(E) of General Order 2021-05

8. In accordance with the provisions of the Standing Order, I request Additional Fees in the amount of \$650 for (indicate requested fees):

☐ Post-confirmation Plan Modification filed by the Debtor.

9. In addition to the fees requested herein and in accordance with the applicable provisions of the Standing Order, I request reimbursement for costs in the amount of \$0 for (describe the costs) N/A.

Wherefore, premises considered, I or my firm pray/prays for the allowance of the fees and costs set out herein to be paid as set out herein and for such other and further relief, both general and specific, to which I or my firm may show myself/itself justly entitled.

DATED: October 8, 2024

Respectfully Submitted,

Leinart Law Firm  
10670 N. Central Exprwy, Ste 320  
Dallas, TX 75231  
469.232.3328 Phone  
214.221.1755 Fax

**By: /s/ Marcus Leinart**

Marcus Leinart  
State Bar No. 00794156  
ATTORNEY FOR DEBTOR

**CERTIFICATE OF SERVICE**

I hereby certify that on the date this motion was electronically filed, I did serve a true and correct copy of the foregoing to the following interested parties and to those listed on the attached matrices, by United States Mail, First Class;

**Debtor**

Wael Samir Falts  
19 Wyck Hill Ln, Westlake, TX 76262-8501

**Chapter 13 Trustee**

Tim Truman  
6851 NE Loop 820, Suite 310, North Richland Hills, TX 76180

**United States Trustee**

United States Trustee - Northern District  
1100 Commerce St, Rm 976, Dallas, TX 75242

By: /s/ Marcus Leinart

Marcus Leinart  
Attorney for Debtor